

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN DOE,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 24-cv-8775

**Judge Jorge L. Alonso**

**Magistrate Judge Sheila M. Finnegan**

**PLAINTIFF’S MOTION TO EXTEND *EX PARTE*  
TEMPORARY RESTRAINING ORDER**

Plaintiff respectfully petitions the Court for an extension of the Temporary Restraining Order (the “TRO”) entered by this Court in this action (Dkt. 24). Plaintiff submits that good cause exists requiring the requested extension.

1. Plaintiff has served the TRO together with associated and targeted requests for production upon several third-party service providers in active concert or participation with Defendants.

2. Consistent with the TRO (Dkt. 24), Plaintiff’s discovery requests seek a full accounting of the monthly sales revenue for Defendants’ Online Marketplace Accounts, as well as a full accounting, on a month-by-month basis, of the amount of funds transferred in and out of the Online Marketplace Accounts; an accounting of the total funds restrained in each financial/payment processing account controlled by or associated with Defendants; the full list of names, addresses, email addresses, and IP addresses, of each person who registered, are listed in, logged into, used, or who otherwise handled or is associated with the stores and associated

financial/payment processing accounts of Defendants; and the full list of stores and associated financial/payment processing accounts opened, operated by, or at any time used by Defendants.

3. Plaintiff has received some of the discovery that was ordered produced from Amazon, DHgate, eBay, PayPal, Stripe, Temu, Walmart, and Wish. However, despite exercising diligence, due to events and actions outside of Plaintiff's control, Plaintiff continues to await some or all of the requested discovery from each of the third-party service providers through whose platforms Defendants have committed the infringement complained of in this action, namely, Alibaba, Aliexpress, Payoneer, and Shopify.

4. The risk that Defendants will liquidate their relevant payment accounts and the financial assets contained in those accounts to avoid this enforcement action remains for the same reasons set forth in Plaintiff's initial Motion for Entry of Temporary Restraining Order (Dkt. 9-12) and later found by the Court (Dkt. 24).

5. As of October 7, 2024, Plaintiff is continuing to work with each of the third-party service providers to effectuate the TRO.

6. Although the TRO provides that these service providers must comply with the Order within seven calendar days, in our experience working with such entities in other similar cases, it typically takes them in excess of 14 calendar days to complete such a request.

7. Plaintiff respectfully submits that the above circumstances constitute good cause to extend the TRO to provide more time for the Order to be fully effectuated.

8. Plaintiff, therefore, requests that the Court extend the TRO, 14 days, or until October 23, 2024, to ensure full compliance with the TRO by all third-party service providers.

**CONCLUSION**

For the reasons set forth above, Plaintiff requests that the Court extend the TRO entered in this action (Dkt. 24) through October 23, 2024.

Dated: October 7, 2024

Respectfully submitted,

/s/BRANDON BEYMER

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